EXHIBIT "A"

RICO STATEMENT

QUESTION #2

| DEFENDANT MISCONDUCT | LIABILITY |
|---|-------------------------------------|
| World Assembly of Muslim Youth The World Assembly of Muslim Youth (WAMY) has lon provided financial support and other forms of materia support to terrorist organizations including but not limited to Radical Muslim Terrorism, or the al Qaeda, and/or the International Islamic Front for the Jihad Against Jews an Crusaders. WAMY conducted or participated directly and/or indirectly in the conduct of the Enterprise's affairs an participated in the operation or management of the operation of the Enterprise itself. WAMY conspired to conduct and/or participate in the operation or management of the enterprise itself. The World Assembly of Islamic Youth was founded in 1972 and headquartered in Riyadh, officially billing itself as an organization which "aims to assist young Muslims around the world in leading fulfilled lives through Islam." In fact, along with Al Haramain Islamic Foundation, Benevolence International Foundation (BIF), the International Islamic Relief Organization (IIRO), the Rabita Trust, and the Muslim World League (MWL), WAMY is one of the principal players in the charity-based funding and sponsorship of al Qaeda. WAMY is part of MWL, receiving substantial support and assistance from MWL. WAMY is an organization that sponsors a number of other Islamic charities, commonly referred to as bodies or members of the League, including, the International Islamic Relief Organization, al Haramain & al Aqsa Mosque Foundation, Benevolence International Foundation, and Rabita Trust, among others. WAMY has over 66 branches and representatives, over 500 member organizations and a worldwide network for the implementation of its programs. It is represented in 34 countries in Asia, in 40 countries in Africa, in 31 countries in Europe, in all three countries in North America, in 17 countries in South America, and in Australia, Fiji, New | g 1962(a) 1 1962(c) 1 1962(d) |

many countries in which it does not maintain a formal physical presence, through its association and membership in other Islamic organizations and committees, including its membership in the Saudi Joint Relief Committee for Kosovo and Chechnya (SJRC).

In September, 2003, WAMY was openly operating jihad camps for Muslim teens in the Mississauga area of Ontario. In March 2004, the Interagency Intelligence Committee on Terrorism (IICT) listed WAMY as an NGO that has demonstrated sustained and active support for terrorist organizations willing to attack US persons or interests. Additionally, the FBI reportedly has files showing WAMY's involvement in funding terrorism in Kashmir and also providing terrorist financing/support to HAMAS, the Muslim Brotherhood and al Qaeda connected organizations. WAMY has been black-listed by the United States Treasury Department because of their ties to al Qaeda.

WAMY is an agency, instrument, and organ of the Kingdom of Saudi Arabia. The

Kingdom controls and directs WAMY's operations, appoints and terminates WAMY's personnel, provides WAMY with virtually all of its funding, determines how funds will be distributed throughout the world, and otherwise stringently controls WAMY's operations. In many countries, WAMY conducts operations from the local Saudi embassy, under the supervision of the embassy's Islamic Affairs Division. Further,

WAMY receives much of its funding from members of the Saudi Royal Family, including Prince Sultan and Prince Naif. Dr. Maneh el Johani simultaneously served as both the Secretary General of WAMY and a member of the Kingdom's Shura Council. The Shura Council, known formerly as the Majlis al Shura, is a consultative body which provides advice to the King on issues of importance to the Kingdom. While head of the Ministry of Islamic Affairs, Saleh bin Abdul Aziz al Sheikh also served as a chairman of WAMY and al Haramain Islamic Foundation.

The relationship between WAMY and the Kingdom was perhaps best described by Dr. Abdul Wahab Noorwali, Assistant Secretary General of WAMY, who said:

"Saudi Arabia's support has been enormous since the establishment of WAMY in 1973.

The Kingdom provides us with a supportive environment that allows us to work openly within the society to collect funds and spread activities. It also provides us with protection abroad through Saudi embassies and consulates, in addition to financial support."

In testimony during Canadian court proceedings, Arafat el Asahi, a representative of MWL and IIRO, made clear that the Saudi embassies closely monitor the activities of the Saudi-based charities and persons associated with those charities, including any press reports relating to those organizations:

If I give any statement in the Canadian papers that goes against the policy of my organization, I would not stay in my office 11 years as I did. That gives me an indication that everybody is within – there is also an embassy in every country. In Pakistan there is a Saudi embassy that knows what happens not only in Saudi organizations but with Saudi individuals. They know who does what.

Abdullah Naseef, Vice Chairman of the Majlis as-Shura of the Saudi Arabian Government, Vice Chairman of WAMY and former Secretary-General of the Muslim World League, explained "Praise is due to Allah SWT and then to the kings of Saudi Arabia who supported this pioneering organization and other non-governmental bodies such as the Muslim World League in Makkah in 1962 and the World Assembly of Muslim Youth in Riyadh in 1973."

The operations of WAMY's branch offices are closely supervised and directed by WAMY's central leadership in Saudi Arabia as well, and functionally operate as agents of the central organization. WAMY's central authority in Saudi Arabia uses a variety of mechanisms to rigidly control the branch offices. WAMY's General Assembly and Board of Trustees in Saudi Arabia set policies and procedures for all WAMY branch offices, and hand-pick the officials who run those branch offices. WAMY headquarters also selects the projects and causes for which funds are to be raised by the WAMY offices throughout the world. Funds raised by the branch offices are transferred back to the organization's headquarters, which then redistributes those funds to the

regional offices, to be applied to projects and causes selected by WAMY's central leadership. WAMY's branch offices are required to submit detailed reports of their activities and finances to the central leadership in Saudi Arabia, for review and approval. High ranking WAMY officials from Saudi Arabia also conduct periodic inspections of the branch offices. In addition, by virtue of its close relationship with the Kingdom's government, WAMY is able to use the Kingdom's governmental apparatus throughout the world, including the embassies, to monitor the day to day activities of the branches.

WAMY Office for Western Europe is located at: 46 Goodge Street, London W1P 1FJ. United Kingdom.

The WAMY website in the UK says WAMY is recognized by the United Nations as a non-government organization (NGO) for its humanitarian and relief work in the Muslim world. Among the means to achieve the aims of WAMY are, according to the website, organizing haj and umra trips (pilgrimages to Mecca and Medina). According to the Saudi Arabian Information Resource, an official Saudi website, WAMY is responsible for building mosques and Islamic Centers across the globe. In 2002, WAMY constructed 28 mosques in Sudan alone.

In 1992, Abdullah bin Laden, Osama bin Laden's nephew, established a WAMY office within the United States, in Falls Church, Virginia. At least through 1998, Abdullah bin Laden served as the president of WAMY's U.S. operations.

In a published statement, WAMY acknowledged that bin Laden's nephew, Abdullah bin Laden, was involved in forming WAMY's U.S. branch in Northern Virginia.

WAMY's name came up in a recent terrorism-related case in Northern Virginia: the investigation into a network of Islamic charities operating in Herndon and elsewhere in the region. The probe involved allegations of tax fraud and other improprieties.

In the case against Soliman S. Biheiri, prosecutors filed documents saying that Biheiri's company, BMI Inc., had managed money for Abdullah bin Laden. The documents said Abdullah bin Laden incorporated WAMY's U.S. branch in Falls Church in 1992, became president and was listed on the

organization's tax forms until at least 1998. The branch is now in Alexandria.

WAMY's U.S. office was also affiliated with the SAAR Network of businesses and charities that were created to provide funding, money laundering and other material support to terrorist organizations, including al Qaeda. WAMY's U.S. operations were raided by federal authorities in conjunction with the ongoing investigation of the SAAR Network's material sponsorship of al Qaeda and affiliated FTOs.

The raid on WAMY in Alexandria was carried out by agents of the FBI, U.S. Bureau of Immigration and Customs Enforcement, and the Joint Terrorism Task Force. Sources said the raid was part of an investigation into whether the group's operations around the world have financial and other ties to terrorists.

WAMY also has provided financial support to the U.S. based Council on American Islamic Relations (CAIR), a purported civil rights organization which received its initial seed money from the Holy Land Foundation for Relief and Development. On December 4, 2001, the Treasury Department listed Holy Land Foundation for Relief and Development as a specially designed terrorist pursuant to Executive Order 13224. Jamal Barzinji, who is listed as having offices at WAMY in Riyadh, is a prominent Wahhabi spokesman in North America. Barzinji was an officer of at least three of the organizations whose Northern Virginia offices were raided by federal officials in March 2002 as part of Operation Green Quest.

WAMY operations (including those in the United States) disseminate hateful literature and Wahhabist propaganda to Islamic schools and Centers. Virulently anti-American, anti-Semitic and pro-jihadist propaganda pervade WAMY's "educational" publications. For example, under the heading "The Prophet asks for Jihad," the WAMY book *Islamic Views* says, "The Prophet Mohammad fought against the infidels and the Jews till he triumphed over them and conducted himself about twenty invasions and he sent tens of regiments led by his companions for Jihad...Damn from Allah to the Jews who made graves of their prophets as Masjid." Later, *Islamic Views* says Islam "is a religion of Jihad" and that jihad "was an answer for the Jews, the liars." "[T]each our children to love taking revenge on the Jews and the oppressors, and teach them that our youngsters will liberate

Palestine and al- Quds when they go back to Islam and make Jihad for the sake of Allah." *Islamic Views* further exhorts Muslims to wage "Jihad against the Satan," and that "You should not back the Jews and the Christians and the Communists against the Muslims; the Communists, the Infidels, the Jews, and the Christians, those who do not believe in Mohammed. You should say they are infidels."

The jihad WAMY advocates in its publications is intensely violent. According to a

WAMY policy statement, "[a] Christian should be asked to repent. If he does not he must be killed." See Written Statement of James B. Jacobsen, President of Christian Solidarity International, submitted to the Sub-Committee of International Relations and Human Rights, Hearing on Persecution of Christians Worldwide, February 15, 1996. The book Islamic Camps: Objectives, Program Outlines and Preparatory Steps, prepared by WAMY's Camps and Conferences Unit and intended to serve as a manual for Islamic youth camps, suggests that youths attending WAMY camps be led in the following refrain:

Hail! Hail! O Sacrificing Soldiers! To Us! To Us!

So we may defend the flag on this Day of Jihad, are you miserly with your blood?! And has life become dearer to you? And staying behind sweeter?

Is staying in this world of torment more pleasing to us?

You are amongst those called upon by Destiny. Come! So we may revive the times the times of our predecessors!

Through these and other WAMY publications, as well as the madrassas, camps, Islamic

Centers, mosques, conferences and other events it sponsors, WAMY has provided the ideological foundation for the al Qaida movement, and actively advocated young Muslims to take up arms and engage in violent jihad against the United States. In this regard, WAMY has played a critical role in al Qaida's cultural assault on the United States and democratic institutions throughout the world.

Below is a list of the offices affiliated with WAMY in the U.S.:

WAMY Office - North America PO Box 8096 Falls Church, VA 22041

Registered Agent Ibrahim S. Abdullah 5134 Leesburg Pike 2nd Floor Falls Church, VA 22302

Abdullah bin Laden 10310 Main St. Apt. 332 Fairfax, VA 22030

Ibrahim S. Abdullah PO Box 8096 Falls Church, VA 22041

Mohammad bin Faris PO Box 8096 Falls Church, VA 22041

WAMY uses InfoCom to host its website and valuable information about the website could still be stored at InfoCom. InfoCom, based in Richland, Texas, had its offices raided on September 6, 2001, by eighty US investigators and has since been found guilty of money laundering and wire fraud. It hosts five hundred websites for Muslim organizations, many of which have ties to terrorism. One such organization is Benevolence International Foundation, which has been identified as an al-Qaeda fundraising vehicle. Information gathered from the raid on InfoCom's office may be used as evidence against Enaam Arnaout and his charity Benevolence International Foundation that have been accused of perjury for denying their ties to terrorism.

InfoCom is closely affiliated with another designated terrorist entity, the charitable organization Holy Land Foundation for Relief and Development (HLFRD), which was designated and had its assets frozen by President Bush on December 5, 2001, for financially supporting HAMAS. Despite having its office across the street from the HLFRD, InfoCom is connected to the charity through its executive Ghassan Elashi who is the Vice President of InfoCom and the Chairman of the HLFRD.

WAMY, which organized relief operations in Afghanistan and is now deeply involved in the conflict in the Balkans, flying out wounded Saudi fighters and providing free medical care in the Saudi German hospital.

Reports from the Balkans suggest that the Arab assistance has significantly improved the firepower of the Muslimdominated Bosnian Government forces, providing assault rifles, mortars, rockets and other weapons to troops who had been equipped largely with hunting rifles and shotguns at the beginning of the war.

The Saudi authorities forbid any public acknowledgement that any Saudi citizens are involved directly in the Balkan conflict, but Government officials say men who volunteer for the relief work often end up as soldiers.

In May of 2000, Russian officials similarly accused the SJRC, the committee through which WAMY conducted activities in Chechnya, of financing and otherwise supporting Islamic terrorists and separatists in that region. According to a May 19, 2000 article in the Russian newspaper *ITAR-TASS*:

The aid to Chechens fighting against Russia, is delivered from the organization of humanitarian assistance to Muslims of Kosovo and Chechnya (the SJRC)....

Officially, the money is sent to Chechnya to be used for religious events and Islamic feasts, but is actually used to finance rebel troops [a representative of the Russian Federal Security Service (FSB)].

According to available information, part of the money is transferred to banking accounts of some warlords, including Shamil Basayev and Khattab...

Russia's security services are aware that these people are financing rebel forces, overseeing arms, food and medicine deliveries, as well as arranging treatment for the wounded and paying allowances to guerillas.

Significantly, Amir Khattab, one of the individuals who received financing directly from WAMY and the SJRC, is a senior al Qaida member who was

deployed to Chechnya by Osama bin Laden to organize al Qaida's operations in that area. According to the 1998 Department of Defense Intelligence Report:

In 1995, Khattab appeared in Chechnya to carry out a special mission assigned to him by Usama ben Laden to organize training camps for international terrorists.... He was a colonel, fought as a field commander, and was wounded in the hand. Khattab organized three training camps in the Vedeno and Nojai-Urt areas of the forested mountain zone. Graduation is held at the three camps every two months. They are very equipped, with firing range facilities and capabilities to create models of "sites of diversion," as well as classes for sappers and snipers.

Through its offices in Peshawar, Pakistan, WAMY has provided extensive support to al Qaeda operatives, Afghan warlords and al Qaeda affiliated Khasmiri terrorists. According to Indian officials, Nazir Qureshi, an Assistant Secretary General of WAMY, has supplied money and other assets to Khasmiri terrorist groups associated with al Qaeda.

In November 2001, Pakistani intelligence officials, operating in conjunction with the Federal Bureau of Investigation, raided WAMY's Pehawar, Pakistan offices, based on its suspected ties to al Qaeda militants. The close relationship between that WAMY office and al Qaeda was confirmed shortly after the search, when an employee of the office hand-delivered a recorded message from Osama bin Laden to the local media.

WAMY has also supported al Qaeda affiliated extremists through its participation in the Islamic Coordination Council, an umbrella organization established in Peshawar, Pakistan in 1985 to coordinate and maximize the funding of the mujihadeen in Afghanistan. Other members of the ICC included the IIRO, Saudi Red Crescent and Qatar Charitable Society. Following the withdrawal of Soviet forces from Afghanistan, the ICC continued to sponsor mujhadeen elements which joined Osama bin Laden's al Qaeda.

Mohammed Ayyub Thukar, president of the World Khasmir Freedom Movement and a principal financier of the al Qaeda affiliated Hizbul Mujihadeen, served as a WAMY official during exile in Saudi Arabia.

WAMY has provided military training to prospective jihadists, and members of the organization have fought under Gulbadin Hekmatyar's Hizb e Islami in Afghanistan. On February 19, 2003, the United States government designated Hekmatyar an SDGT pursuant to Executive Order 13224, based on his affiliation with al Qaeda.

WAMY also has served as a distribution channel for training documentation between the al Qaida leadership in Afghanistan and operational cells throughout the world. When he was arrested in 1992, Ahmed Ajaj, who was subsequently convicted for his role in the 1993 World Trade Center bombing, had in his possession an al Qaida Manual entitled "Military Lessons in the Jihad against the Tyrants" detailing how to establish and maintain clandestine operational cells. The manual was distributed to Ajaj by WAMY. The same manual was subsequently recovered from the London apartment of African embassy bomber Khalid al-Fawwaz in 1998.

The Philippine government asked Australian military intelligence for assistance in investigating the provision of funds from WAMY's Australian office to the Islamic militant secessionists in the Philippines in 1999.

In 1996, authorities determined that IIRO and WAMY, another group associated with al-Qaeda, had funded Hamas through Interpal. In documents confiscated at the time, recipient Hamas organizations were asked to send letters directly to IIRO and WAMY rather than to Interpal. Investigators also tied Interpal to the Holy Land Foundation for Relief and Development (the largest Hamas front organization in the United States when it was shut in December 2001) and to Sheikh al-Moayad of the al-Aqsa International Foundation. As proof of his ability "to get money to the Jihad," al-Moayad offered an FBI informant a receipt showing that he had transferred \$70,000 to Interpal.

The Committee for Supporting the Palestinian Uprising is continuing its activities to help the victims of Israeli aggression in occupied Palestinian territories. The relief work has been undertaken in compliance with the directives of Interior Minister Prince Naif who is also the supervisor

general of the committee, according to a statement released by the committee yesterday.

This committee has been extending assistance to the families of Palestinian martyrs and prisoners as well as those wounded during the recent uprising against Israeli occupation. The relief activities have been carried out with the help of various aid agencies set up in the West Bank and Gaza.

The committee also gives SR10,000 in cash for each Palestinian prisoner in Israeli jails. A total sum of SR22,180,000 has been allocated for assistance to prisoners. An amount of SR20,000 each is being paid to 358 families of the martyrs of the uprising reaching a total of SR71,60,000. A sum of SR40 million will be divided among 8,000 wounded while 1,000 handicapped Palestinians will get SR20,000 each.

The committee has already paid an amount of SR1.56 million for the treatment of Palestinians at Saudi hospitals. A total of 137 Palestinians wounded during the uprising have been treated in Saudi hospitals. They will return home soon after full recovery.

The committee has made all preparations for the second phase of the food basket distribution to Palestinian families next week. The work will be undertaken by the teams and charity organizations recommended by the Saudi Relief Committee, MWL, Islamic Development Bank, and WAMY.

The Muslim Brotherhood needs countries for their members to infiltrate and work safely as will as to move freely towards establishing a base in each country, identify the suitable existing Islamic movements in these countries to strengthen the relation with to spread their ideologies in a sense to repeat their successful experience in Saudi Arabia and Qatar. They also need a continuous breed of new generations saturated with their ideologies. Last, but not least, they need the money. In none Moslem countries, the level of safety and freedom is variable. However, the constitution and laws in these countries may provide a significant level to achieve their objectives but the problem lays with the Moslem countries. So this is what they did:

- To utilize efficiently the already established Muslim World League (MWL).
- For the breeding of generations, they

- established the World Assembly of Moslem Youth (WAMY) in 1973.
- To control the Moslem Countries through their economy and that gave the birth of the Islamic Development Bank (IDB). It was established in pursuance of the Declaration of Intent issued by Conference of Finance Ministers of Muslim Countries held in Jeddah in December 1973. The Inaugural Meeting of the Board of Governors took place in July 1975, and the Bank was formally opened on 20 October 1975 to coincide with the International Islamic Economy First Conference was convened in Makkah under auspices of King Abdul Aziz University. The conference gathered many religious leaders including top MBs. At that time the rector of the University was Dr. Mohammed Omer Al-Zubair (Yassein Qadi Uncle).

Between June 5, 1967 and March 3, 1975, the Muslim Brotherhood made a significant success in their objectives. However, there were major incidents made them continuously adjust their plans but the most important ones:

- The incident of black September 1970 in Jordan which gave them another dimension on the issue of Israel and Arab war.
- The Reform Movement in Qatar in February 1972 made them shift the establishment of WAMY in Saudi Arabia rather than Qatar.
- Meeting with President Qadhafi in Libya in May 1972 made them expedite the establishment of the IDB in Saudi Arabia.
- Assassination of King Faisal in March 1975 was the corner stone in adding the strategy of private investment to finance the Muslim Brotherhood objectives.

On June 8, 2003, Mauritania's pro-Western leader President-Colonel Maouya Sidi Ahmed Taya battled an apparent coup attempt, as small-arms and tank fire erupted near the presidential palace. The fighting followed a government

crackdown on Islamic activists that started with the U.S.-led war in Iraq. Mauritania launched its crackdown initially to stem Islamic shows of support for Iraq. In May, 2003, dozens of Islamic leaders had been arrested for allegedly using mosques to recruit young men as fighters. At least 32 were freed on June 6 when rebel soldiers released prisoners from two jails. The foiled coup was believed to be at least inspired by al Qaeda supporters in Mauritania. It appeared to be led by officers recently dismissed from the army and others angry about the government's campaign against Islamic extremism.

Mauritania is one of only three Arab nations that has diplomatic relations with Israel. After a bitter falling-out with former Iraqi president Saddam Hussein, Taya traded an alliance with Iraq for improved relations with Israel. In the aftermath of the foiled Islamist plot discovered in Mauritania, Mohamed El Hacen Ould Dedew was incarcerated and interrogated by the Mauritanian police during May, 2003. He had issued a "vetwa" (or "fatwah") condemning the relations with Israel, then expressly criticizing the Mauritanian government's policy.

According to the questioning by Mauritanian police, Mohamed El Hacen Ould Dedew had a number of dubious contacts with "charities" that have been shut down in the USA by the Department Of Justice for funneling the cash directly to terrorist organizations. As a leading Muslim scholar in Mauritania, Mohamed El Hacen Ould Dedew maintained close relationships and partnerships with NGOs under law enforcement investigations such as WAMY, MWL, Rabita Trust, and Al-Haramain. Mohamed El Hacen Ould Dedew backs those who finance terrorism.

Within the scope of his activities for WAMY, Mohamed El Hacen Ould Dedew performed a number of programs and had to work closely with some top officials of the organization, including Abdallah M. bin Laden, who was the official in charge of the US bureau and the representative of the organization WAMY.

In Saudi Arabia, Dedew studied and gave lectures and acknowledged having met several other key members of the bin Laden family:

1. The Bin Laden family alleged chief, Bakr Mohamed Bin Laden.

- 2. Tarek Bin Laden, Director of the Tarek Mohamed Bin Laden Company, and Director of the Bin Laden Hospital in Saudi Arabia.
- 3. Mechhour Medoudi, grand-son of the Bin Laden family, company director.
- 4. Jemal El Harith, son-in-law of the family, company director in Medina.
- 5. Adnan Moursil, son-in-law of the family, Director of "Dar El Quran" ("House of Koran") in Medina.

According to the Mauritanian police sources, "phone numbers to contact Al-Qaeda [6313566 and 6342275]" were spread within the Islamist stream in Mauritania, while at the same time Ould Dedew's followers were broadcasting movies praising Sept. 11 attacks, the attackers, and legitimatizing their goals.

The Jamiat Talaba Arabia was founded on January 13, 1975 at a meeting held in Icchra, Lahore. Its 23 founding members pledged, among other things, to organize the students from all sects to bring about an Islamic revolution in Pakistan. It was a highly politicized organization from the very beginning, one that fully participated in the anti-Bhutto movement in 1977. Many of its leaders and cadres, including chief Organizer Qari Minhajjudin, were injured and arrested during the movement. With the Jamaat Islami, it participated in the movements against various successive governments, with the exception of the Ziaul Haq government.

The membership of the Jamiat Talaba Arabia is open to all those students of the madrassas who agree to abide by its constitution and programs. However, most of its members come from the madrassas controlled by the Jamaat. Many of them join the Jamaat, and it's other affiliated organizations.

This is perhaps the only organization of Pakistani students, which is consciously Pan-Islamic in this ideology. It has vast widespread links with Islamic movements all over the Muslim world. It is the only organization of Pakistani students which is a member of the World Association of Muslim Youth (WAMY) -- an organization of Muslim students from all over the world, with its headquarters in Saudi Arabia.

WAMY is also involved in religious and jehadi training for its member organizations. It also has a very close working

relationship with many other Islamic and Islamist societies, engaged in proselytize and jehadi activities around the globe. These include, among others, the Jamiatul Khairia of Qatar, Ittehadul Munzamat Al-Tulabiyya of Kuwait, and the Muslim United Students Association of Maldives.

The organization has been vigorously campaigning for international Islamic movements, even when it was not linked with them. In the 25 years of its existence, it has campaigned for the Ikhwanul Muslimoom of Syria and Egypt and the Hamas of Palestine. It is ready to campaign for any international Islamic cause with which it can identify itself. It particularly espouses the cause of the Palestinians.

The Jamiat Talaba Arabia has also been involved in Afghanistan from the very beginning. It joined the jehad in occupied Kashmir as soon as the Kashmiris started their armed struggle in 1990 and was fully involved by 1993. The members of the Jamiat Talaba Arabia fought under the umbrella of Gulbadin Hakmatyar's Hizbe Islami in Afghanistan and, in occupied Kashmir, under the discipline of the Hizbul Mujahideen. The Jamiat's members have occupied important positions in their parent organizations. The incumbent Deputy Supreme Commander of the Hizbul Mujahideen Pakistan, Mohammad Javed Qasuri, is the Jamiat's former chief organizer.

Jehad has become the focus of the Jamiat's activities in the last two decades. It organizes military training programs every year after the annual convention at different places in Pakistan and Azad Kashmir.

All Jamiat members are required to undergo military training even if they do not wage jehad. The annual exercise, spread over 15 to 30 days, refreshes their military skills.

Sardar Ija Afzal Khan, Amir of *Jamaat-e-Islami* since early June, 2002, "highlighted [the] freedom struggle of the Kashmiris at the forums of World Assembly of Muslim Youth..."

The Indian government contends that "90 percent of the funding [for Kashmir militants] is from other countries and Islamic organizations like the World Association of Muslim Youth..."

Adel Batterjee's name appears twenty-seven times in the TAC, with specific allegations as to his role in sponsoring al Qaeda. These allegations include Batterjee's monetary and ideological sponsorship of al Qaeda historically, beginning with the al-Bir (meaning "Benevolence") charitable organization in Saudi Arabia.

Al-Bir was shut down in conjunction with a Saudi crack down on organizations supporting terrorism. Batterjee then founded the United States-based charity organization, Benevolence International Foundation (or "BIF"), now a SDGT group. Batterjee also served as secretary general of WAMY.

"If a relief worker decides that he wants to join the fighting forces, we would not stop him," said Adel A. Batterjee, chairman and secretary general of the World Assembly of Muslim Youth. Following the September 11, 2001 attack, Adel Batterjee was formally designated as a terrorist sponsor and supporter pursuant to Executive Order 13224.

Batterjee recruited Enaam Arnaout from Bosnia to run BIF in the United States and Batterjee continued financing BIF after 1994. Batterjee is alleged to have been identified in al Qaeda documents seized in Bosnia from BIF's offices as one of the key persons involved in financing al Qaeda.

Batterjee falsely states in his Declaration that any visits he made to the United States since 1967 have been for "personal" reasons. Batterjee Dec. at 4. However, Benevolence International Foundations' I.R.S. Application for 501(c)(3) charity status identifies Adel Abdul Jalil Batterjee as one of the three founders of BIF, and further states: "The founders of the organization live abroad, *but travel to the United States on a regular basis*."

It is difficult at best to square Batterjee's representation to the Court that any trips were "personal" with this admission that he traveled regularly to the United States on BIF business. The facts as to Batterjee's contacts with the United States are further confused by an application by Batterjee to the State of Florida. In an application to conduct BIF's affairs in that State, Defendant Batterjee lists his address as 150 S. University Drive, in Plantation, Florida, 33324.

Evidence that Batterjee, individually or through BIF, sponsored al Qaeda is found in the proffer of evidence in the

United States government's criminal proceeding involving BIF. Excerpts from this proffer include:

BIF had in its Sarajevo office a computer file labeled "Tareekh Osama," or "Osama's History." The file contains scanned images of documents which chronicles Usama Bin Laden's activities in Afghanistan which led to the formation of al Qaeda and even includes later reports of the danger Bin Laden poses to BIF possessed in the file a the US. handwritten draft list of the people referred to within al Qaeda as the "Golden Chain," wealthy donors to mujahideen effrots. At the top of the list is a Koranic verse stating: "And spend for God's cause." The list contains twenty names, and after each name is a parenthetical, likely indicating the person who received the money from the specified donor. "Usama" appears after seven of the listings, including the listing "Bin Laden Brothers." "Baterji", LBI's and BIF's founder, appears after six of the listings.

Batterjee commissioned the writing of a biography specifically about Osama bin Laden and the origins of the al Qaeda network in Arabic. This biography, *The Arab Volunteers in Afghanistan*, was jointly published in 1991 by the Benevolence International Foundation and the World Assembly of Muslim Youth. The book details Osama bin Laden's life, including the creation of bin Laden's terrorist network, al Qaeda. On the back cover is a written statement that expresses the ideology of the book, "This is the jihad in Afghanistan. What we see now, it is a blessed river. The Arab people are the people that feed the jihad river."

Prominent Saudi businessman and terrorism financier Adel Abdul Jalil Batterjee is the Chairman and one of the largest shareholders of Al Shamal Islamic Bank in Khartoum, Sudan. Al Shamal Bank is an instrumental bank in Osama bin Laden's financial support network. Osama bin Laden used Al Shamal Bank for the funding of his al Qaeda network leading up to the 1998 United States Embassy bombings in Africa. During the planning of these bombings, Jamal Ahmed al-Fadl, an al Qaeda operative, received \$250,000 from the Al Shamal Bank in Sudan to purchase a plane for al Qaeda. The

plane was used to coordinate al Qaeda's efforts in preparation for the 1998 Embassy bombings, which killed over 250 people and injured 1,000 more. Defendant Faisal Islamic Bank was implicated during al-Fadl's 2001 United States trial regarding the bombings as holding and managing bank accounts for al Qaeda operatives.

WAMY and BIF are tightly connected organizations that share the same leadership and work together on a number of joint projects. Batterjee was the secretary general of WAMY at the time he founded the al Qaeda front organization, BIF in the United States. Outside of Batterjee's role, the two organizations WAMY and BIF have also cooperated in joint-publishing of literature and film that bears both of their logos.

WAMY and BIF shared a common address in Peshawar, Pakistan, and frequently shared common officers and directors. BIF has provided material support and resources to al Qaeda. According to a Pakistani Government website, WAMY is located at PO Box 1055 in Peshawar. The Office of Foreign Assets Control (OFAC) lists PO Box 1055, Peshawar, Pakistan as an address of the SDGT Organization, BIF.

A year after it was designated by the United States, the official Saudi press agency (SPA) reported in October 16, 2003 that Al-Bir, the parent organization of BIF, was participating in a project with WAMY and IIRO.

Subsequent examination of trial exhibits, transcripts, and other evidentiary materials from or relating to the New York *jihad* cell cases stemming from the 1993 World Trade Center bombing has revealed multiple connections to the BIF.

In approximately 1993, in conversations with former senior al Oaeda lieutenant Jamal

Ahmed al Fadl, Osama Bin Laden identified three Muslim charities as the primary sources of al Qaeda financial and fundraising activity—of which were the Saudi-based BIF and WAMY.

These organizations served a critical role in the Arab-Afghan terrorist infrastructure by laundering money originating from bank accounts belonging to Bin Laden and his sympathetic patrons in the Arabian Gulf, providing employment and travel documents to al Qaeda personnel worldwide, and helping "to

move funds to areas where al Qaeda was carrying out operations."

According to a U.S. Justice Department brief on the subject:

[Al-Fadl] understood from conversations with Bin Laden and others in al Qaeda that the charities would receive funds that could be withdrawn in cash and a portion of the money used for legitimate relief purposes and another portion diverted for al Qaeda operations. The money for al Qaeda operations would nevertheless be listed in the charities' books as expenses for building mosques or schools or feeding the poor or the needy.

Standing orders were left by Bin Laden to keep all transactions involving the charitable groups in cash only; by this method, these NGOs were manipulated as a secret laundry to make al Qaeda's financial network virtually invisible. The charities would then create false documentation for the benefit of unwary donors, purportedly showing that the money had actually been spent on orphans or starving refugees. In fact, according to some former employees of these organizations, upwards of 50% of their total funding was secretly diverted directly to al Qaeda and Osama Bin Laden.

Lajnat Al-Birr Al-Islamiyya, the precursor to BIF, was established in 1987 in Pakistan and Saudi Arabia by Batterjee. It was founded as an "affiliate" of WAMY.

In approximately 1993, when the manager of BIF's main office in the Sudan traveled to Saudi Arabia to meet with local donors, he was arrested and held for several weeks by Saudi authorities while being subjected to repeated interrogation by Saudi intelligence regarding the now apparent relationship between BIF and Osama Bin Laden.

According to Jamal Ahmed Al-Fadl, al Qaeda Treasurer Madani Al-Tayyib worried that the arrest could only mean that the Saudi regime had uncovered documents and records linking BIF directly to Osama Bin Laden.

When the Sudanese administrator was finally freed and able to return to Khartoum, Bin Laden hastily convened a meeting to determine whether he had divulged any sensitive information regarding al Qaeda's relationship with BIF. Yet, in the end, Bin Laden worried needlessly; though the Saudis had indeed uncovered evidence of a BIF/al Qaeda connection, no apparent steps were taken to close this source of funding or support. Several months later, Al-Tayyib indicated to Al-Fadl that "the problem had been fixed" and no more was spoken of the incident.

In December 2001, US authorities raided BIF's Chicago offices and found videos and literature glorifying martyrdom. In March 2002, Bosnian authorities searched BIF's Sarajevo offices and seized weapons, booby traps, false passports, and plans for making bombs. They also found an al-Qaeda organizational chart, notes on the formation of al-Qaeda by Osama bin Laden and others, and a list of wealthy sponsors from Saudi Arabia.

In August 2003, the Syrian-born head of BIF, Enaam Aranout in the US was sentenced to 11 years in prison after being convicted of fraud. Aranout admitted diverting thousands of dollars from BIF to Islamic militants in Bosnia and Chechnya.

A 1977 Islamic conference sponsored by the American Muslim Social Scientist (AMSS) culminated with the inspiration to create International Institute of Islamic Thought (IIIT). The conference was held in Lugano, Switzerland at the house of well-known Muslim Brotherhood member and SDGT Youssef Nada. Ismail R. al Faruqi, founder of IIIT, is believed to have received a \$25 million grant from the Islamic Development Bank to actually start IIIT in 1981.

Four of IIIT's founding members —Jamal Barzinji, Dr. Abdul Hamid Abu Sulayman, Taha Jaber al-Alwani, and Anwar Ibrahim -- were representatives of WAMY. These directors listed WAMY's Saudi Arabian and Malaysian addresses as their contact address at the time of the Institute's 1980 Pennsylvania incorporation.

Soliman Biheiri credits Ahmed Totonji, a vice president of IIIT, as founding WAMY in the 1970's. Furthermore, Totonji worked for the Al Rahji Bank at its Majis-al-Shura branch and was asked by Saleh al Rajhi to work with the SAAR Foundation. The WSJ believes Totonji executed the decisions of Sulayman and Saleh al Rajhi at the SAAR network.

Soliman Biheiri is a member of IIIT. If correct, then an IIIT member (Biheiri) knows Youssef Al Qaradawi, who is a member of the Bank al-Taqwa's Shari'ah Board and one of al-Taqwa's largest shareholders as of December 31, 1999.

Bank al-Taqwa and its founder, Youssef Nada, were designated SDGT's pursuant to Executive Order 13224, on November 7, 2001. IIIT officers Barzinji and Hisham Altalib previously worked for Nada International in Lugano, Switzerland between 1977-1983 and 1974-1983, respectively. Nada International is a Yousef Nada-controlled company. US authorities believe Nada and his Bank al-Taqwa are bankers for al Qaeda.

Additionally, Biheiri managed monies for IIRO's US office, called IRO and headed by Suleiman al-Ali. IRO shared the same Virginia business address as IIIT (555 Grove Street). Al-Ali's IRO has been linked with Mercy International, who US prosecutors claimed provided support for the 1998 US African embassy bombers. Mercy International is the successor to Human Concern International, an ostensible charity which Osama Bin Laden described in an interview as a primary supporter of Al Qaeda.

SAAR Foundation and its successor, the Safa Trust ("the SAAR network"). US investigators believe the SAAR network's complexity, which includes overlapping officers of organizations that conduct multiple financial transactions amongst themselves, is intended to obscure the network's activities.

The suspicious activities of the SAAR network officers, many of whom are IIIT officials or close business associates of IIIT officials, are reasonable grounds to suspect that the SAAR network is a vehicle to facilitate funding for terrorist activities. Additionally, there is evidence that the individuals and organizations involved in the SAAR Network organization, including IIIT, have historically close connections with Al Qaeda and groups associated with Al Qaeda.

Historically, IIIT's board members include the following individuals:

- Abusulayman, Abdulhamid
- Al Alwani, Taha J.

- Al Faruqi, Ismail R.
- Altalib, Hisham (WAMY)
- Barzinji, Jamal
- Farhan, Ishaq Ahmad
- Ibrahim, Anwar (WAMY)
- Jaghlit, Mohammad
- Syeed, Sayyid M.
- Totonji, Ahmad

Four of IIIT's original nine board members founded the SAAR Foundation in 1983, 2 years after IIIT's formation. Those officers were:

- Abusulayman, Abdulhamid
- Al Faruqi, Ismail R.
- Altalib, Hisham (WAMY)
- Barzinji, Jamal (WAMY)

The SAAR Foundation's largest benefactors are Sulieman and Saleh al Rajhi. Tax records indicate the Safa Trust gave IIIT \$984,000 in 2000 and the SAAR network has been funding IIIT since at least 1993, and probably much early.

The complexities of the SAAR network's financial activities, which include funding IIIT, caught US authorities' attention in 1996 during investigations into US funding of Hamas. In 1994 IIIT gave WISE a \$10,000 donation. WISE is headed by Sami al-Alrain, Tarik Hamdi (future IIIT employee) and Ramadan Shallah. Ramadan Shallah emerged in 1995 as the leader of PIJ, previously a member of WISE from 1991-1995. Correspondence from IIIT and SAAR officials to WISE at the time of their 1994 contribution show the IIIT/SAAR officials knew WISE intended to support PIJ and Hamas.

Originally a director of IIIT, Anwar Ibrahim, born August 10, 1947, is a former deputy prime minister of Malaysia and an opposition leader who is currently imprisoned. In 1998, Anwar was arrested on charges of sodomy and corruption.. In 1974, Ibrahim was then elected to become the second president of ABIM a Muslim youth organization Ibrahim founded in 1971. He remained in this position until 1982 when he stepped down to be an active participant of the political ruling party UMNO. Ibrahim had been a student of Faruqi's. It is reported that Faruqi was responsible for Ibrahim's political career.

Originally listed as a director of IIIT, Jamal Barzinji is actually vice president, head of Research and Publication for IIIT. Like Hisham Altalib, Barzinji is a scientist earning advanced chemical engineering degrees from Louisiana State University in 1974. During his appointment at IIIT, Nada International of Lugano, Switzerland employed Barzinji between 1977-1983. Prior to that, he was general manager for North American Trust, Ft Wayne, IN from 1974-1977. He became president and chairman of the board, MAR-JAC Poultry, Gennville, GA in 1983. He is listed a founding member for Amana Mutual Funds, USA. Elsewhere is a board member of the American Muslim Council and a director of the Safa Trust. He is also director of the Bank Islam Malaysia.

The residences of Taha Jabir al-Alwani and Jamal Barzinji, along with the offices of IIIT, were the target of US federal raids in Virginia on March 20th and 21st, 2002, as part of a crackdown on a large money-laundering network that was funding terrorist groups. The search warrant for the raids indicated that US investigators conducted the raids for any links bewteen al-Alwani, Barzinji, IIIT had to al Qaeda.

Tarik Hamdi, the publisher of IIIT's *Islamiyat Al-Ma'rifah*, actively supported Osama bin Laden by providing him with a replacement battery for his cellular telephone; the same telephone bin Laden used when orchestrating the 1998 US Embassy Bombings. That IIIT would continue to employ Tarik Hamdi even after his support for bin Laden was made public is indicative of the organization's stand as a supporter of terrorism.

Officials have <u>linked</u> the non-profit IIIT to Osama bin Laden and al-Qaeda. Matthew Levitt of the Washington Institute for Near East Policy, testified before Congress in August of 2002 that IIIT employee Tarik Hamdi <u>had personally provided</u> batteries for Osama bin Laden's satellite phone, keeping the wandering terrorist mastermind connected to his scattered ground troops.

According to an Operation Green Quest <u>affidavit</u>, IIIT had also sponsored Basheer Nafi, "an active directing member of (Palestinian Islamic Jihad) front organizations." Nafi, who <u>acknowledges</u> a chummy relationship with Sami al-Arian, lectures at London's Muslim College. For this reason, Operation Green Quest raided the homes of Abdul Hamid Abu-Sulayman, former IIIT president; Jamal Barzinji,

Director of IIIT; and Hisham Al-Talib, Director IIIT.

Customs agent David Kane also uncovered a monetary tie between IIIT and terrorism. Kane claims that, during a raid in Tampa, he <u>found letters</u> that prove IIIT sent at least \$50,000 to the World Islamic Studies Enterprise (WISE), a front for Palestinian Islamic Jihad. The same affidavit states Ahmad Totonji <u>personally signed</u> an IIIT check in the amount of \$10,000 to Sami al-Arian's Tampa Bay Coalition for Justice and Peace on November 1, 2001. Such fortunes are chump change for the SAAR Trust, founded by Saudi magnate Suleiman Abdul Al-Aziz al-Rajhi. SAAR received \$1.7 billion in donations in 1998 alone.

WAMY also operates under the aegis of the Saudi Joint Relief Committee, along with a number of other Islamic charities. WAMY further sponsored al Qaida through its participation in the SJRC.

The SJRC is comprised of the IIRO, WAMY, the Saudi Red Crescent, and the Muslim World League, among others. The SJRC has been connected to Osama bin Laden and two of his top operatives, Wa'el Hamza Jalaidan and Adel Muhammad Sadiq bin Kazem. The United States Treasury Department has branded Jalaidan a Specially Designated Global Terrorist Entity [SDGT], stating that Jalaidan is "an associate of Usama bin Laden and a support of al-Qa'ida terror."

The web site for The Saudi Joint Committee for the Relief of the people of Kosovo links WAMY to the SJRC. However, the web site has direct links to "sister organizations" that are defendants such as MWL, Al Haramain, Saudi Red Crescent, and WAMY. The account numbers mentioned are joint accounts in Al rajihi and commercial bank: general account, "22", Zakat account "33".

Recent statements by Treasury Department officials, testifying before Congress, further confirm that WAMY continues to serve as a front for al Qaida and other terrorist organizations. During a recent hearing before the U.S. Senate Committee on Banking, Housing, and Urban Affairs, Treasury Under Secretary Stuart Levey asserted that "wealthy Saudi financiers and charities have funded terrorist organizations and causes that support terrorism and the ideology that fuels the terrorists' agenda... Even today, we believe that Saudi donors may still be a

significant source of terrorist financing, including for the insurgency in Iraq." Levey expressed particular concern about the continued involvement of WAMY, the IIRO and MWL in the financing of terrorist activities throughout the globe.

Another manual found in Ahmed Ajaj's possession was hate literature against Americans, Christians, and Jews. This encyclopedia, which glorified the hijacking of busses and the killing of innocent civilians in Israel, was published by WAMY.

"Saying that the Jews and the Christians are infidels is part of our religious dogma," said Saleh S. al-Wohaibi, the American-educated secretary general of the World Assembly of Muslim Youth. Any changes in the way it is taught should be decided by Saudis, he said, adding, "It doesn't mean we try to incite hatred against others, but my religion has its own principles that should not be violated or changed."

WAMY affiliate, Ahmed Ajaj, was convicted in 1994 by the US for his role in bin Laden's 1993 World Trade Center bombing.

Prosecutors have alleged in previous court documents that WAMY espoused hatred of Jews and portrayed people who murdered Israelis as heroes. But the WAMY statement compared the group's activities to the YMCA, saying it focuses on "youth education, youth development and serving the Muslim community."

WAMY sponsors various "humanitarian" causes, including Muslim religious youth camps around the world. The following is an excerpt from an officially sanctioned song to be performed by campers, as printed in an English-language WAMY training manual obtained in London:

"Youth of [Islam] are the guided youth. Come! Come to a final decision: The Prophet has called out and so has the Qur'an. So blessed is the servant who responds when he is called... Bring back the glory to it's lions, And restore the zeal to its soldiers. Flatten evil in its cradle, And unsheath the swords... Hail! Hail! O sacrificing soldiers! To us! To us! So we may defend the flag. On this Day of Jihad, are you miserly with your blood?!"

The Saudi government also provides material support for WAMY. *Islamic Views* is an Arabic language book written by WAMY and printed by the Saudi Government's *Armed Forces Printing Press*. Under the heading "The Prophet asks for Jihad," Islamic Views says, "The Prophet Mohammad fought against the infidels and the Jews till he triumphed over them and conducted himself about twenty invasions and he sent tens of regiments led by his companions for *Jihad*...Damn from Allah to the Jews who made graves of their prophets as Masjid." Later, *Islamic Views* says Islam "is a religion of *Jihad*" and that *Jihad* "was an answer for the Jews, the liars."

[T]each our children to love taking revenge on the Jews and the oppressors, and teach them that our youngsters will liberate Palestine and al-Quds when they go back to Islam and make *Jihad* for the sake of Allah.

Islamic Views exhorts Muslims to wage "Jihad against the Satan," and that "You should not back the Jews and the Christians and the Communists against the Muslims; the Communists, the Infidels, the Jews, and the Christians, those who do not believe in Mohammed. You should say they are infidels."

WAMY's Islamic youth camps have been hosted at locations around the world, including in the Kansas City area. In fact, WAMY's website reports that they held such a camp in Kansas City as recently as the Summer of 2002. In late 2002 WAMY launched a program to train 1,000 Muslim college students "to propagate Islam and remove misconceptions from the minds of students at different universities." As of November 2002, sixty students were undergoing WAMY training in Kansas City. Beginning in August, 2000 Mohammed Maghazil lived at 6325 N LONDON Ave, Apt F, Kansas City, MO. Maghazil was Vice-President of WAMY in 1998-1999.

Finally, WAMY produced, *A Handy Encyclopedia of Contemporary Religions and Sects*, a tract of anti-Semitism comparable to the Protocols of the Elders of Zion.

The book purports to describe various Jewish sects such as "Al-Sabi'a: these are the followers of Abdullah ibn Sab'a,

entered (sic) Islam to destroy it from within;" "The Rotaries...a Masonic organization dominated by the Jews of the world. The real objective of these organizations is for the Jews to have an opportunity to mingle with others, this would afford them the chance to gather crucial information needed for their economical and political success as well as to influence the society;" The "Lions' Club...looks like it is a benevolent organization but undoubtedly, it is a member of the Masonic group and the Jewish hands are in it because their objectives are also to dominate the world. They teach Zionist ideology to their members;" "The Dogha Jews" are "[a] group of Jews [who] have joined Islam but actually they remained Jews at heart; they planned to hurt Islam. They dominate the economy, education, and the media. They took part in undermining the Ottoman state and caliphate."

Under "Animosity toward the Jews," WAMY lists reasons for Muslims to hate Jews:

...the seed of the Gulf-war was planted by a Jew; the Jews are enemies of the faithful, God and the angels; The Jews are humanity's enemies; they foment immorality in this world; The Jews are deceitful, they say something but mean the exact opposite; Who was behind the biological crisis which became like brain washing? A Jew; Who was behind the disintegration of family life and values? A Jew; The one that stirred-up hate and turned the individuals against their Muslim governments in the Arab peninsula - a Jew; Who promoted Atheism and made the countries thrive on Muslims' blood? The Jews: every tragedy that inflicts the Muslims is caused by the Jews.

The World Assembly of Muslim Youth has thereby knowingly, for a period of many years, provided critical financial and logistical support to al Qaeda, and/or Radical Muslim Terrorism, and/or the International Islamic Front for the Jihad Against Jews and Crusaders, to support the terrorist organization's global jihad. The September 11th Attack was a direct, intended and foreseeable product of the aforementioned World Assembly of Muslim Youth's participation in the jihad campaign for al Qaeda, and/or Radical Muslim Terrorism, and/or the International Front for

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| the Jihad Against Jews and Crusaders. | |
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